SUPPORT SB 239, Re: Prohibiting the Use of Certain Rodenticides
SUPPORT HB 5289, Re: Nighttime Lighting of State-Owned Buildings at Certain Times for the Protection of Birds
OPPOSE SB 95295, Re: Agricultural Development and Innovation

Testimony by: Laura Simon
President, Connecticut Wildlife Rehabilitators Association
Committee: Joint Committee on the Environment
Date: March 7, 2022

Members of the Environment Committee:

My name is Laura Simon, and I am a wildlife ecologist and the president of the Connecticut Wildlife Rehabilitators Association (CWRA), a statewide network of licensees who care for injured and orphaned wildlife.

On behalf of the CWRA, I am testifying to support with requested amendment modifications **SB 239, an Act Prohibiting the Use of Certain Rodenticides for the Protection of Hawks, Raptors and Other Wildlife**.

As a wildlife rehabilitation organization with members throughout Connecticut, we are seeing a rapid increase in the number of horrific cases of wild animals succumbing to slow secondary poisoning by rodenticides. The public rarely witnesses these animals as they succumb to gruesome hemorrhagic deaths, yet the Connecticut rehabilitators who care for predatory wildlife, including hawks, owls, and foxes, directly experience the horrors of this secondary poisoning.

As rodents became resistant to first generation anticoagulant rodenticides like Warfarin, second generation rodenticides were created which are far more toxic and remain in the animal tissue for a longer period – exposing predatory wild animals to secondary poisoning when eating their normal prey. Anticoagulant rodenticides have alarmed scientists and biologists because of their deleterious effects on non-targeted wildlife and how they "bioaccumulate" in exposed organisms.

A recent study by the Director of the Tufts University Wildlife Clinic, Dr. Maureen Murray, found that 100% of the forty-three red-tailed hawks admitted tested positive for anticoagulant rodenticides. A study 5 years earlier showed 97% of the hawks evaluated tested positive for SGARS, with high mortality as the outcome in both studies.[1]

Google "rodenticides secondary poisoning and wildlife" and articles and studies will appear, underscoring the far-reaching impact of these toxins on many species of predatory wildlife including some of our most

[1] Murray, Maureen, Continued Anticoagulant Rodenticide Exposure of Red-tailed Hawks (*Buteo jamaicensis*) in the Northeastern United States with an Evaluation of Serum for Biomonitoring. Environmental Toxicology and Chemistry. 17 August 2020

iconic species. Two separate studies performed by researchers at the University of California in Los Angeles, and the National Park Service, found that rat poisons were present in ALL mountain lions and 90% of the bobcats tested, and the second-generation rodenticides also made these mammals susceptible to mange outbreaks.

Wild animals are not the only ones affected. More than 4,400 children 6-years of age and younger were poisoned due to long-acting anticoagulant rodenticides in the United States in 2016, according to the American Association of Poison Control Centers. This number has risen each year and disproportionally effects lower income families.

One commonly used SGAR, Brodifacoum, developed in the mid-1970s to replace "first generation" rodenticides like Warfarin, is 100-1000 times more toxic[2].

Brodifacoum persists a long time in the environment. The compound's half-life in soil varies between 12 and 25 weeks, with detectable amounts measured in the livers of opossums, as much as nine months after exposure. A one-time use of Brodifacoum can result in the compound persisting in the food chain for several years. Even the EPA reiterated the long-standing scientific consensus that "Brodifacoum avian toxicity is two orders of magnitude more toxic than is required for the EPA's category of very highly toxic." [3]

The secondary poisoning characteristics of Brodifacoum are so substantial that some researchers suggested using it as a "secondary poison" -- i.e., feeding Brodifacoum to prey species with the intent of having those animals transmit the compound to target predators. [4]

As early as 1980, it was well known and expected that anticoagulated rats will be consumed by birds of prey who then become secondarily poisoned.[5]

Far more ecological alternatives exist for controlling mouse and rat problems under an integrated Pest Management approach which prioritizes trash and food management, exclusion, and other more long lasting and ecological means of control.

California led the way in passing a bill to reevaluate and restrict the use of second-generation anticoagulants and there is no reason Connecticut cannot follow suit. CA has a huge pest control industry, yet they will adapt to this legislation as there are other viable options – including more long lasting and ecologically sound solutions. Anticoagulant rodenticides may be cheap and easy, but just like DDT, their use must be restricted given our growing awareness of the highly damaging and cumulative impact these toxic products have on wildlife, our environment, and human health and safety. The pest control industry will not reform its MO unless meaningful restrictions are put in place which promote use and further development of more ecologically sound solutions.

---

[2] Shore, Exposure of Non-Target Vertebrates to Second-Generation Rodenticide in Britain, New Zealand Journal of Ecology at 199 (1999)

[3] EPA, Registration Eligibility Decision for Rodenticide Cluster at 79-80 (1998)

[4] Gillies, Secondary Poisoning of Mammalian Predators During Possum Rodent Control Operations At Trounson Kauri Park, New Zealand Journal of Ecology at 190 (1999)

[5] Mendenhall, Secondary Poisoning of Owls by Anticoagulant Rodenticide, Wildlife Society Bulletin at 311 (1980).

The CWRA supports SB 239 as a first step towards alleviating the tremendous harm caused to wildlife by these secondary anticoagulant poisons. However, we strongly urge the Committee to support amendment language to strengthen the bill by banning second generation anticoagulant pesticides from sale and use statewide, in addition to prohibiting the use of first-generation anticoagulant pesticides on state lands.

Finally, we **oppose HB 5295** re *Agricultural Development and Innovation* due to its goal of encouraging the growth of confinement farming of rabbits for food. Currently, Rabbit Hemorrhagic Disease (RHDV2) caused by a virus in the Calicivirus family, is prevalent in the western part of the United States and making its way to the East coast. This virus is easily transmissible via oral, nasal, and conjunctival routes, is highly resistant to hot and cold temperatures, can survive up to three months without a host, and is fatal to wild and domestic rabbits.

We also **support HB 5289** concerning the Nighttime *Lighting of State-Owned Buildings* as a commended and necessary first step in preventing the tremendous carnage from migratory birds hitting buildings while in flight. We would like to see this bill go farther by requiring that not just non-essential *exterior* lights be extinguished during peak migratory hours but *interior* lights as well, as window lighting plays a huge role in disorienting birds and leading to window crashes. When interior lighting is diminished the bird/ building collisions are markedly reduced. Chicago researchers found that that by halving the lighted window area during migration seasons, bird mortality could be reduced by 59%.[6]

I thank you for your time and consideration of our views on these three bills.

[6] Benjamin M. Van Doren, David E. Willard, Mary Hennen, Kyle G. Horton, Erica F. Stuber, Daniel Sheldon, Ashwin H. Sivakumar, Julia Wang, Andrew Farnsworth, Benjamin M. Winger. **Drivers of fatal bird collisions in an urban center**. *Proceedings of the National Academy of Sciences*, 2021; 118 (24)